

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,)
) C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,)
) **JURY TRIAL DEMANDED**
v.)
)
ROSS INTELLIGENCE INC.,)
)
Defendant/Counterclaimant.)

**DECLARATION OF RYAN SEEWALD IN SUPPORT OF DEFENDANT ROSS
INTELLIGENCE INC.'S REPLY IN SUPPORT OF ITS MOTION FOR SUMMARY
JUDGMENT ON ITS AFFIRMATIVE DEFENSE OF FAIR USE**

I, Ryan Henry Seewald, declare as follows:

1. I am a Counsel at Crowell & Moring, LLP, and on the legal team for ROSS Intelligence, Inc. I am an attorney, admitted to the bar of the state of Colorado and have been admitted *pro hac vice* to appear before this Court. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.’s (“ROSS”) Reply in Support of Its Motion for Summary Judgment on Its Affirmative Defense of Fair Use.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Brief for Respondent Oracle, *Google LLC v. Oracle Am., Inc.*, 593 U.S. 1 (2021) (No. 18-956), downloaded from Westlaw.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Brief for Appellee Sony, *Sony Computer Ent., Inc. v. Connectix Corp.*, 203 F.3d 596 (9th Cir. 2000) (No. 99-15852), downloaded from Westlaw.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Brief for Appellee Sega, *Sega Enterprises Ltd. v. Accolade, Inc.*, 977 F.2d 1510 (9th Cir. 1992) (No. 92-15655),

downloaded from Westlaw.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Denver, Colorado on this 13th day of November, 2024.

/s/ *Ryan Henry Seewald*

Ryan Henry Seewald